

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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Case No. 13-47036 (CEC)

In re:

Chapter 7

STEERFORTH TRADING, INC.

Debtor,

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JOHN S. PEREIRA, as Chapter 7 Trustee for
the Estate of Steerforth Trading, Inc.

Plaintiff,

ADV. PRO. NO. 16-01126-CEC

-against-

ISAAC ANZAROOT and ISAAC SABBAGH,

Defendants.

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DEFENDANT ISAAC ANZAROOT'S RULE 7026(A) INITIAL DISCLOSURES:

Pursuant to Bankruptcy Rules of Procedure 7026, along with Federal Rules of Civil Procedure 26, and the Eastern District of New York's local rules, Co-Defendant Isaac Anzaroot (hereinafter "Anzaroot"), by and through his attorneys, Law Offices of Kalavesios & Choudhry, PLLC., hereby serve his initial disclosures as follows:

- I. Individuals likely to have discoverable information that may be used to support Defendant Isaac Anzaroot's defenses and cross-claim:
 1. Isaac Anzaroot
Address: 1090 E 4th Street, Brooklyn, New York 11230
 2. Cathey Rouch
Address: 154 Silver Lake Avenue, Edison, New Jersey 08817
 3. Dan Herres (Former employee of Steerforth Trading, Inc.)
Address is unknown.
 4. Jessica Koscinski (Former employee of Steerforth Trading, Inc.)
Address is unknown.
 5. Megal Elmendorf (Former employee of Steerforth Trading, Inc.)
Address is unknown.

II. Categories and Location of all Documents that may be used to support the claims or defenses of Defendant that is in his possession, custody or control:

1. Defendant Isaac Anzaroot has no documents in his possession, custody or control concerning the activities of Steerforth Trading, Inc.
2. Documents which Mr. Anzaroot believes will support his defenses and cross-claim include, but may not be limited to, all corporate documents of Steerforth Trading, Inc. (such as the Certificate of Incorporation, bylaws, resolutions and/or minutes), lease agreements to which Steerforth Trading, Inc. is a party, and the business records of Steerforth Trading, Inc., all of which are or may be in the possession of the Trustee.

III. Computation of Damages

1. As to the cross-claim, Defendant Isaac Anzaroot will assemble information and documentation regarding damages incurred by Defendant as a result of Co-Defendant's conduct resulting in this lawsuit.

IV. Insurance

1. Defendant Isaac Anzaroot is unaware of any insurance agreements that will indemnify or reimburse the parties in this adversary proceeding.

V. Continuing Discovery

1. Defendant reserves his right to supplement or modify these initial disclosures as additional information becomes known or available.

Dated: Brooklyn, New York
February 3, 2017

Respectfully submitted,
Law Offices of
Kalavesios & Choudhry, PLLC.

/s/ Ted Kalavesios

By: Ted Kalavesios, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Rule 26 Disclosure**, was electronically filed with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record in this case:

Eckert Seamans Cherin & Mellott, LLC.
Attorneys for Co-Defendant Isaac Sabbagh
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Cross-Claimant Isaac Sabbagh*

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Attorneys for Plaintiff

/s/ Ted Kalavesios
Ted Kalavesios, Esq.